

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

Allergan, Inc.,  
Allergan Pharmaceuticals Ireland  
Unlimited Company, and Allergan USA, Inc.,

Plaintiffs,

v.

Revance Therapeutics, Inc. and Ajinomoto  
Althea, Inc. d/b/a Ajinomoto Bio-Pharma Services,

Defendants.

C.A. No. 21-1411-RGA

**PUBLIC VERSION\***

**Confidential Version Filed: December 28, 2022**

**Public Version Filed: January 11, 2023**

**PLAINTIFFS' UNOPPOSED MOTION FOR  
LEAVE TO FILE SECOND AMENDED COMPLAINT**

Plaintiffs Allergan, Inc., Allergan Pharmaceuticals Ireland Unlimited Company, and Allergan USA, Inc. ("Allergan" or "Plaintiffs") respectfully move the Court for leave to amend their First Amended Complaint (D.I. 16) pursuant to the Federal Rule of Civil Procedure 15(a). A copy of the proposed Second Amended Complaint is attached as Exhibit A and a blackline comparing the proposed Second Amended Complaint to the First Amended Complaint is attached as Exhibit B.

Pursuant to D. Del. LR 7.1.1, counsel for Allergan conferred with counsel for Defendants, and Defendants do not oppose Allergan's motion.

\* \* \*

*\* Defendants respectfully request that Exhibit 18, which is a portion of their Biologics License Application, remain redacted in its entirety for the same reasons as set forth in their prior motion to seal granted by the Court (D.I. 76, 78).*

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*/s/ Jeremy A. Tigan*

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December 28, 2022

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**[PROPOSED] ORDER**

Having considered Plaintiffs' Unopposed Motion for Leave to File Second Amended Complaint (the "Motion"),

IT IS HEREBY ORDERED this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, that the Motion is GRANTED.

\_\_\_\_\_  
The Honorable Richard G. Andrews  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on December 28, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on December 28, 2022, upon the following in the manner indicated:

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